# **BRANCH OFFICE**

VERSION 2

EFFECTIVE: July 1, 2004

Internal Au	ıdit Com	ıbliance (	Checklist
-------------	----------	------------	-----------

Auditor's Name and Date

### BRANCH OFFICE WALK-THROUGH PROCEDURES

Licer	isee:	Review Period:					
in de		s in compliance with applicable statutes, reg	d other "criteria established by the chairman" gulations, and Minimum Internal Control				
	Date of Inquiry	Person Interviewed	Position				
	Dute of inquiry	T GISSON INIGER (18 WGG					
1) U	records/documentation as indicated and						
ŀ	All "no" answers require referencing and/or comment, and should be cited as regulation violations, unless the Board Chairman has granted a MICS variation or the question requires a "no" answer for acceptability. All exceptions noted should be carried to the internal auditor's report/summary of findings for timely follow-up.						
3) '	"(#)" refers to the Minimum Internal Co	ontrol Standards for Cage and Credit, Version	on 5 or to the applicable regulation/statute.				
accep instru	ch offices (as defined by <b>Regulation 6</b> A oted more than \$500,000 (cash or non-c		ed by <b>Regulation 25.010(1)</b> ] that either than \$500,000 (cash or non-cash) on credit date are visited and reviewed at <b>least every</b>				
	Branch offices (as defined by <b>Regulation 6A.010</b> ) not meeting the aforementioned criteria are visited and reviewed at <b>least once</b> every five years.						
Revie colle	ew the list of branch offices and inde cted on credit instruments is based or						
Indic	cate Branch Office Visited and Date o	of Visit:					

### MICS Variations and Regulation Waivers:

Obtain copies of MICS variation and regulation waiver requests and GCB correspondence regarding such requests from appropriate property personnel. Review to determine status of evidence of any waivers or alternative requirements imposed by granted variations. Modify and/or perform additional procedures as applicable.

Verified per representation Verified per observation/examination

VERSION 2

EFFECTIVE: July 1, 2004 Page 1 of 7

Internal Au	ıdit Com	ıbliance (	Checklist
-------------	----------	------------	-----------

Auditor's Name and Date

# BRANCH OFFICE WALK-THROUGH PROCEDURES

Licensee:	Review Period:	

	Questions	Yes	No	N/A	Comments, W/P Reference
1.	Review prior internal audit reports. Schedule any relevant exceptions cited, including those cited by the GCB or the CPA, or include a copy of the prior audit reports in the workpapers and follow up on any problems noted. Duplication of exceptions when the CPA is referring to exceptions reported in internal audit reports is not necessary.				
2.	Has the written system of internal control for branch office procedures been read prior to the completion of this checklist to obtain an understanding of branch office procedures?				
3.	If outstanding credit instruments are transferred to the branch office, is a copy of the credit instrument retained and a receipt sent to the licensee ("home office")? (MICS #18)				
4.	Does the branch office maintain a detailed listing of outstanding credit instruments in its custody? (MICS #20)				
5.	Is the above listing prepared or reviewed and signed by a "home office" individual independent of credit transactions and collections thereon? (MICS #21)				

Internal Au	ıdit Com	ıbliance (	Checklist
-------------	----------	------------	-----------

Auditor's Name and Date	
	1

# BRANCH OFFICE WALK-THROUGH PROCEDURES

Licensee:		R	Review 1	Period:
Questions	Yes	No	N/A	Comments, W/P Reference
6. Are all payments on outstanding credit instruments received at the branch office permanently record at the "home office" and on the records of the office? (MICS #2	ded			
7. When partial payments are made credit instruments in the custody the branch office (includes persochecks, payroll checks and cash checks), and the original instrumare not replaced with a marker for the remaining balance, are they evidenced by a multi-part receip other equivalent document) which contains:	of onal ier's eents or			
a. The same receipt number on copies? (MICS #23)	all			
b. Patron's name? (MICS #23	3)			
c. Date of payment? (MICS #	223)			
d. Dollar amount of payment a nature of settlement (cash, checks, etc.)? (MICS #23)	nd			
e. Signature or initials of indiverse receiving payment? (MICS #23)				
f. Number of credit instrumen which payment is being mad (MICS #23)				
8. Are records of all correspondence transfers to and from the licensed and other documents related to issued credit instruments maintain (MICS #31)	2,			

Internal A	Audit	Compliance	Checklist
------------	-------	------------	-----------

Auditor's Name and Date

# BRANCH OFFICE WALK-THROUGH PROCEDURES

Licensee:		F	Review	Period:
Questions	Yes	No	N/A	Comments, W/P Reference
9. Are written-off or settled credit instruments authorized in writing? (MICS #32)				
10. Are such authorizations <b>not</b> made b branch office personnel? ( <b>MICS</b> #33)	у			
11. Is the receipt or withdrawal of a customer deposit evidenced by at least a two-part document with one copy going to the customer and one copy remaining in the branch office files? (MICS #35)				
<ul><li>12. Does the multi-part receipt contain the following information:</li><li>a. Same receipt number on all copies? (MICS #36)</li></ul>				
b. Customer's name and signature (MICS #36)	?			
c. Date of deposit/withdrawal? (MICS #36)				
d. Dollar amount of deposit/withdrawal? (MICS #36)				

Internal Au	ıdit Com	ıbliance (	Checklist
-------------	----------	------------	-----------

Auditor's Name and Date	
	1

# BRANCH OFFICE WALK-THROUGH PROCEDURES

Licensee:		R	Review P	eriod:
Questions	Yes	No	N/A	Comments, W/P Reference
e. Nature of deposit/withdrawal (e.g., cash, check, chips)? (MICS #36)				
<b>Note:</b> Provided ALL of the above information (a through e) is available, the only required information for all copies of the receipt is the receipt number.				
13. Have procedures been established to:				
a. Maintain a detailed record by patron name and date of all funds on deposit held in the branch office? (MICS #37)				
b. Maintain a current balance of all customer deposits which are in the branch office inventory or accountability? (MICS #37)				
c. Reconcile this current balance with the deposits and withdrawals at least daily? (MICS #37)				
14. Is access to outstanding credit instruments restricted to persons authorized by management? (MICS #28)				
15. Is a reasonable effort, as defined by <b>Regulation 6.120(3)</b> , made to collect outstanding casino accounts receivable?				
16. Are settlements made for the purposes set forth in <b>Regulation</b>				

Verified per representation Verified per observation/examination

**6.120(5)**?

Internal A	Audit	Compliance	Checklist
------------	-------	------------	-----------

Auditor's Name and Date

# BRANCH OFFICE WALK-THROUGH PROCEDURES

Licensee:		R	leview 1	Period:
Questions	Yes	No	N/A	Comments, W/P Reference
17. Are settlements documented pursuant to <b>Regulation 6.120(6)?</b>				
18. Are completed, settled credit instrument documents mailed to the accounting department within 72 hours of completion? (MICS #34)				
19. Does a "home office" employee independent of branch office operations and the cage department reconcile the listing prepared pursuant to MICS #20 to the credit issuances and payments recorded by the cage? (MICS #72)				
20. Does the branch office maintain the following documents:				
a. A monthly log of payments received on credit instruments that includes the patron's name on account to which the payment is being applied, the name of individual making the payment (if different than the patron), date of payment, dollar amount of payment, and nature of payment (e.g., cash, check)? (MICS #74)				
b. A monthly log of all funds deposited and withdrawn that includes the patron's name, date of deposit/withdrawal, dollar amount of deposit/withdrawal, and nature of deposit (e.g., cash, check) and withdrawal (e.g., cash, marker payment)? (MICS #74)				

Internal A	Audit	Compliance	Checklist
------------	-------	------------	-----------

Auditor's Name and Date

# BRANCH OFFICE WALK-THROUGH PROCEDURES

Licensee:	e: Review Period:					
	Questions	Yes	No	N/A	Comments, W/P Reference	
by t amo NG dol on t adju rate						
visi col and ma per list sch	s the name of the branch office ited, the total previous year fiscal lections amount for that office, I date of visit been added to the ster list of branch office visits formed by internal audit? This is maintained for branch office neduling purposes and for review GCB and CPA.					
Proced	ures Modified or Added					

Auditor's Name and Date

# BRANCH OFFICE REGULATION 6A WALK-THROUGH PROCEDURES

Licensee:	Review Period:	Review Period:					
NGC Regulation 6.090(15) requires the internal auditor to use guidelines, checklists and other "criteria established by the chairman" in determining whether a Group I licensee is in compliance with applicable statutes, regulations, and Minimum Internal Control Standards (MICS). The use of this checklist satisfies these requirements.							
Date of Inquiry	Person Interviewed	Position					
records/documentation as indicated and confirmed via examination/review of do							
has granted a MICS variation or the que	2) All "no" answers require referencing and/or comment, and should be cited as regulation violations, unless the Board Chairman has granted a MICS variation or the question requires a "no" answer for acceptability. All exceptions noted should be carried to the internal auditor's report/summary of findings for timely follow-up.						
) "(#)" refers to the Minimum Internal Control Standards for Currency Transaction Reporting, Version 3 or to the applicable regulation/statute.							
Scope: Branch offices (as defined by <b>Regulation 6A.010</b> ), and/or independent agents [as defined by <b>Regulation 25.010(1)</b> ] that either accepted more than \$500,000 (cash or non-cash) in deposits or collected, in total, more than \$500,000 (cash or non-cash) on credit instruments during the previous fiscal year, or more than \$500,000 in the fiscal year to date are visited and reviewed at <b>least every other year</b> .							
Branch offices (as defined by <b>Regulation 6A.010</b> ) not meeting the aforementioned criteria are visited and reviewed at <b>least once</b> every five years.							
This walk-though checklist is intended for such visits and should not be completed as part of "in-house" walk-through procedures. Review the list of branch offices and independent agents maintained pursuant to Cage and Credit MICS #73 [total payments collected on credit instruments is based on branch office's documentation required in MICS #74(a)] in determining which branch offices are to be visited. A copy of this list should be included in the internal audit workpapers.							
Indicate Branch Office Visited and Date of Visit:							

Verified per representation Verified per observation/examination

**VERSION 2** 

EFFECTIVE: July 1, 2004 Page 1 of 17

Auditor's Name and Date	
	1

#### BRANCH OFFICE REGULATION 6A WALK-THROUGH PROCEDURES

Licensee:	Review Period:
MICS Varia	tions and Regulation Waivers:
Obtain copi	es of MICS variation and regulation waiver requests and GCB correspondence regarding such requests from
appropriate	property personnel. Review to determine status of evidence of any waivers or alternative requirements imposed by
granted vari	ations. Modify and/or perform additional procedures as applicable.

Date Approval Granted	MICS Number or Regulation	Description of Variation/Waiver Granted	Number(s) of Procedure Modified or Added	W/P Ref. (if appl.)

**Note:** Variations/waivers and associated equipment need only be scheduled once. Refer to the workpaper where the details are scheduled and complete the last two columns of the above grid if walk-through procedures are affected.

	Questions	Yes	No	N/A	Comments, W/P Reference
1.	Review prior internal audit reports. Schedule any relevant exceptions cited, including those cited by the GCB or the CPA, or include a copy of the prior audit reports in the workpapers and follow up on any problems noted. Duplication of exceptions when the CPA is referring to exceptions reported in internal audit reports is not necessary.				
2.	Has the written system of internal control for branch office procedures been read prior to the completion of this checklist to obtain an understanding of branch office procedures?				

Verified per representation Verified per observation/examination

VERSION 2

EFFECTIVE: July 1, 2004 Page 2 of 17

Internal A	Audit	Compliance	Checklist
------------	-------	------------	-----------

Auditor's Name and Date

# BRANCH OFFICE REGULATION 6A WALK-THROUGH PROCEDURES

Licensee:		]	Review Period:		
Questions	Yes	No	N/A	Comments, W/P Reference	
Regulation 6A.020 Transactions	s				
3. Do branch office personnel protection the exchange of cash (including foreign currency) for cash in a transaction in which the amounth exchange is more than \$3. (Regulation 6A.020(1))	ng any unt of				
4. Do branch office personnel process the exchange of a patron's case check or other negotiable instour combination thereof, in an greater than \$3,000? (Regulate 6A.020(2))	sh for a rument, amount				
5. Do branch office personnel process the exchange of a patron's case any transfer by electronic, with other method, or combination methods, in an amount greate \$3,000? (Regulation 6A.020)	sh for re, or of r than				
6. Are branch office personnel a that it is a prohibited transacti accept a safekeeping or front deposit, and then refund (in e. \$3,000) the deposit with a che different denominations and r of bills? ( <b>Regulation 6A.020</b> )	on to money xcess of eck or number				
7. Are branch office personnel a that a cash deposit is not cons put at risk by the issuance of a marker and thus cannot be tre verified gaming winnings for purpose of obtaining a check exchange for the cash deposit MICS #39)	idered a ated as the in				

Internal A	Audit	Compliance	Checklist
------------	-------	------------	-----------

Auditor's Name and Date

# BRANCH OFFICE REGULATION 6A WALK-THROUGH PROCEDURES

Lic	ensee:		]	Review Period:	
	Questions	Yes	No	N/A	Comments, W/P Reference
8.	Do branch office personnel issue checks or any other type of negotiable instrument? Also, do branch office personnel perform any electronic, wire or any other form of transfers for the benefit of patrons? If yes, describe branch office's procedures.				
Mu	ltiple Transaction Log (MTL)				
9.	Does the MTL include (6A MICS #6a - f):				
	a. Description of the patron (or agent)?				
	b. Patron's name and agent's name, if known?				
	c. Identification of the location where the transaction occurred?				
	d. Time and date?				
	e. Type and dollar amount of the transaction or U.S. dollar equivalent, and the amount and type of foreign currency for foreign currency transactions?				
10.	For transactions recorded on the MTL: (6A MICS #6g and #27b)				
	a. Does the handler record the transaction?				
	b. Is the handler's signature for each transaction recorded on the				

Verified per representation Verified per observation/examination

MTL?

Internal A	Audit	Compliance	Checklist
------------	-------	------------	-----------

Auditor's Name and Date

# BRANCH OFFICE REGULATION 6A WALK-THROUGH PROCEDURES

Licensee:		]	Review !	Period:
Questions	Yes	No	N/A	Comments, W/P Reference
c. Is a loggable transaction recorded immediately after its occurrence?				
11. Inquire as to the cut-off time used by the branch office for the MTL, and record same in the comments column. Is this time consistent with the one listed for the designated 24-hour period in the submitted system of internal control? (6A MICS #26)				
12. Is one MTL completed for each designated 24-hour period for each monitoring area, regardless of whether any loggable transactions have occurred? (6A MICS #29)				
13. If no loggable transactions were observed, do branch office personnel record "no action" on the MTL? (6A MICS #29)				
14. At the conclusion of the 24-hour period is a new MTL started and the recording on the previous MTL ceased? (6A MICS #28)				
15. Is an indication as to the end of the 24-hour period recorded on the MTL? (6A MICS #28)				
<ul> <li>16. Do the branch office employees perform the following procedures:</li> <li>a. At the beginning of each shift, review the MTL to become familiar with descriptions of individuals whose transactions are being monitored? (6A MICS #27c)</li> </ul>				

Internal A	Audit	Compliance	Checklist
------------	-------	------------	-----------

Auditor's Name and Date

# BRANCH OFFICE REGULATION 6A WALK-THROUGH PROCEDURES

Licensee:			Review Pe	riod:
Questions	Yes	No	N/A	Comments, W/P Reference
b. Notify other personnel in the same monitoring area that the monitoring process has been initiated for a particular patron?  (6A MICS #27d)				
c. During the designated 24-hour period monitor a patron's transactions for possible supplemental transactions and reportable transactions? (6A MICS #27e)				
Loggable Transactions				
17. Are the following transaction types monitored/recorded on the MTL (6A MICS #27b):				
a. Cash-in:				
Repayment of credit previously extended?				
2) As a deposit for gaming or safekeeping purposes, if the 6A licensee has actual knowledge of the amount of cash deposited?				
3) Other cash-in transactions not specifically addressed?				
b. Cash-out:				
As a redemption of chips, tokens, or other gaming instrumentalities?				
2) As a payment of a winning				

<b>Internal Audi</b>	t Compliance	Checklist
----------------------	--------------	-----------

Auditor's Name and Date

# BRANCH OFFICE REGULATION 6A WALK-THROUGH PROCEDURES

Licensee:			]	Review	Period:
	0	* 7	3.T	37/4	G WAD C
	Questions	Yes	No	N/A	Comments, W/P Reference
3)	As a payment of tournament or contest winnings or promotional payout?				
4)	As a withdrawal of a deposit for gaming or safekeeping purposes, if the 6A licensee has actual knowledge of the amount of cash withdrawn?				
5)	In exchange for a check or other negotiable instrument?				
6)	In exchange for an electronic, wire or other transfer of funds?				
7)	As a credit advance (including markers)?				
8)	For travel expenses or other complimentary expenses or for a distribution of a gaming incentive such as settlement of a gaming debt, front money discount, or other similar distribution based upon gaming activity?				
9)	Other cash-out transactions not specifically addressed?				
\$3,000, exceedi MTL?	transaction in excess of including a single transaction ng \$10,000, recorded on the (Regulation 6A.040(2) and CS #27f)				

Internal A	Audit	Compliance	Checklist
------------	-------	------------	-----------

Auditor's Name and Date

# BRANCH OFFICE REGULATION 6A WALK-THROUGH PROCEDURES

Licensee:	Period:			
Questions	Yes	No	N/A	Comments, W/P Reference
19. Does an employee monitor and record a patron's loggable cash transaction on an MTL when he or she has actual knowledge that a patron exceeded the \$3,000 loggable transaction threshold by completing same type transactions in amounts of \$3,000 and less? (Regulation 6A.040(2))				
Note: The objective of this question is to evaluate the employee's understanding of the "knowledge" requirement of Regulation 6A. Discuss this requirement with the employee to determine whether in the execution of his or her normal job duties the employee is required to access information (or has accessed information) that would provide knowledge of lesser amounts that may require aggregation. Indicate the records required to be examined that would provide the employee with such knowledge.				
CTRC-N Procedures  20. Is a CTRC-N completed when a single transaction exceeds \$10,000? (Regulation 6A.030(1))				
21. Is a CTRC-N completed when the aggregated same type transactions exceed the \$10,000 threshold? (Regulation 6A.040(2)(a) and (3), and 6A MICS #21)				
22. Is a CTRC-N completed when a dissimilar cash-in transaction exceeding \$10,000 occurs during a patron's one single visit to the branch office? (Regulation 6A.040(2)(b)				

Auditor's Name and Date

# BRANCH OFFICE REGULATION 6A WALK-THROUGH PROCEDURES

Licensee:			Review Per	riod:
Questions	Yes	No	N/A	Comments, W/P Reference
23. Is a CTRC-N completed when a dissimilar cash-out transaction exceeding \$10,000 occurs during a patron's one single visit to the branch office? (Regulation 6A.040(2)(c) and (3))				
24. Are only same type transactions aggregated when reporting a "multiple transaction" on the CTRC-N? (Regulation 6A.040(2))				
25. Do branch office personnel aggregate cash transactions for reporting purposes by either:				
<ul> <li>Aggregating all cash-in or cash- out transactions completed by a patron during the branch office's designated 24-hour period rather than just by a single visit?</li> </ul>				
b. Excluding the cash transactions reported on a CTRC-N relating to a single visit from other same type transactions during other visits completed by the patron during the branch office's designated 24-hour period?				
Note: Refer to questions #12 - 14 in  Regulation 6A Newsletter #5 for  further guidance on the aggregation				

Verified per representation Verified per observation/examination

of transactions.

Internal A	Audit	Compliance	Checklist
------------	-------	------------	-----------

Auditor's Name and Date

# BRANCH OFFICE REGULATION 6A WALK-THROUGH PROCEDURES

Licensee:		]	Review Perio	od:
Questions	Yes	No	N/A	Comments, W/P Reference
26. Do branch office personnel complete the identification and reporting procedures described in <b>Regulation 6A.030</b> for any supplemental transaction? ( <b>Regulation 6A.040(4)</b> )	Yes	No	N/A	Comments, W/P Reference
<b>Note:</b> A supplemental transaction is a same type transaction that is to be aggregated with previous transaction(s) for which a CTRC-N has been completed.				
27. Does the person handling the transaction sign a CTRC-N pursuant to <b>Regulation 6A.030(3)</b> for any transaction in excess of \$10,000? ( <b>Regulation 6A.030(3) and 6A</b> MICS #25)				
28. Are completed CTRC-N reports and MTLs transmitted to the accounting department within 24 hours after the end of the designated 24-hour period? (6A MICS #25 and #30)				
Patron Identification Requirements				
29. Prior to completing a cash transaction that will exceed the \$10,000 threshold for either a multiple same type transaction, a single transaction or a dissimilar transaction, does the branch office employee perform the following for an unknown patron or for an unknown agent of a patron (Regulation 6A.030(2), Regulation 6A.040(3), 6A MICS #18b and #21):				
a. Obtain the patron's name? (6A MICS #18(b)(1))				

Internal A	Audit	Compliance	Checklist
------------	-------	------------	-----------

Auditor's Name and Date

# BRANCH OFFICE REGULATION 6A WALK-THROUGH PROCEDURES

Licensee:		]	Review 1	Period:
Questions	Yes	No	N/A	Comments, W/P Reference
b. Obtain, or reasonably attempt to obtain, the patron's permanent address and social security or employer identification number?  (6A MICS #18(b)(2))				
c. Obtain one of the following (6A MICS #18(b)(1)): Driver's license; Passport; Non-resident alien identification card; Other reliable government issued identification credential (indicate type); or Other picture identification credential normally acceptable as a means of identification when cashing checks (indicate type)?				
d. Examine the identification credential obtained, including the expiration date, to verify the patron's name, and if possible, to verify the accuracy of the information obtained under (b). (6A MICS #18b(3))				
30. If an agent of a patron performs a reportable transaction, do branch office personnel perform the procedures under (a) - (d) of the previous question and report the information obtained for the agent and the patron, if possible?  (Regulation 6A.030(4))				

Internal A	Audit	Compliance	Checklist
------------	-------	------------	-----------

Auditor's Name and Date

# BRANCH OFFICE REGULATION 6A WALK-THROUGH PROCEDURES

Licensee:		]	Review	Period:
Questions	Yes	No	N/A	Comments, W/P Reference
31. Does the branch office employee who handles the transaction and knows the patron rely on the patron's information on file when completing a CTRC-N? (6A MICS #19a and c) Indicate who maintains the patron's information on file. If yes, complete the following three questions. If no, indicate N/A for the following three questions.				
32. Does the branch office employee handling the transaction verify that the patron's information on file is correct and current (i.e., the transaction date is prior to the identification credential expiration date)? (6A MICS #19b and #19e) Indicate the method used in verifying the patron's information on file.				
33. Does the CTRC-N indicate "known patron, information on file" as the method of verification and include the original method of identification, including type and number, of the identification credential originally examined? (Regulation 6A.030(8))				
34. Is the branch office responsible for periodically updating the patron information on file? (6A MICS #19d) If yes, does the branch office perform the following procedures: If no, indicate the department responsible for performing this procedure.				
Examine identification credentials at least every three years?				

Internal A	Audit	Compliance	Checklist
------------	-------	------------	-----------

Auditor's Name and Date

# BRANCH OFFICE REGULATION 6A WALK-THROUGH PROCEDURES

Licensee:		]	Review F	Period:
-		1	I I	
Questions	Yes	No	N/A	Comments, W/P Reference
b. Document the examinations in the information on file? <i>Indicate where examination is documented.</i>				
c. Record the expiration dates of identification credentials in the information on file?				
35. If identification verification is not possible, does the employee refuse to complete the transaction? (6A MICS #18a)				
36. If the branch office discovers it has completed a reportable transaction before obtaining the required patron's information, does the branch office attempt to obtain the necessary information and identification credential from the patron?  (Regulation 6A.030(7))				
a. If the patron refuses to provide or cannot provide the necessary information and identification credential, do branch office personnel bar the patron from gaming at the 6A licensee's establishment and the establishment of its affiliates until the necessary information and identification credential is supplied and inform the patron of such, if possible?  (Regulation 6A.030(7))				

Internal A	Audit	Compliance	Checklist
------------	-------	------------	-----------

Auditor's Name and Date

# BRANCH OFFICE REGULATION 6A WALK-THROUGH PROCEDURES

Licensee:			Review 1	Period:
	T.7		37/4	g Wan c
Questions	Yes	No	N/A	Comments, W/P Reference
b. Is a report completed to the extent possible for a patron in which an identification credential was not obtained?  (Regulation 6A.030(7) and 6A MICS #24)				
38. When a patron is barred from gaming does the 6A licensee notify branch offices? (6A MICS #24) Indicate the method used to communicate information to branch offices relating to barred patrons.				
Gaming, Safekeeping or Front Money Deposits				
39. Is the method or methods used to accommodate deposits (i.e., physically segregating or recording the denomination and number of bills) described in the submitted system of internal control?  (Regulation 6A.020(7) and 6A MICS #37) State the method(s) described in the system of internal control.				
40. Is the method or methods used to accommodate deposits in agreement with the method or methods stated in the submitted system of internal control? ( <b>Regulation 6A.020(7) and 6A MICS #37)</b> Indicate the method(s) used by the branch office.				

Internal A	Audit	Compliance	Checklist
------------	-------	------------	-----------

Auditor's Name and Date

# BRANCH OFFICE REGULATION 6A WALK-THROUGH PROCEDURES

Licensee:	Review Period:			iod:
Questions	Yes	No	N/A	Comments, W/P Reference
41. Does the branch office employee, for all gaming, front money or safekeeping deposit and withdrawal cash transactions greater than \$3,000, record the transaction on a receipt form in accordance with the Cage and Credit Minimum Internal Control Standards and in accordance with Regulation 6A.020(7)? (6A MICS #35)	Tes	110		Comments, w/1 Reference
42. If funds are physically segregated, is such indication recorded on the receipt form? (Regulation 6A.020(7) and 6A MICS #35)				
Note: 6A MICS #35 also applies to any deposits made in foreign currency.				
43. Is the nature of any noncash deposit documented on the receipt form? (6A MICS #36)				
44. When a transfer to the licensee's affiliate is completed, is the denomination and the number of bills of each denomination of the cash deposited communicated to the affiliate? (6A MICS #38)				
45. When a cash deposit transfer is received from an affiliate, for all full and partial returns of each deposit, is only cash of the same denominations and no more than the same number of bills of each denomination as was deposited returned to the patron?  (6A MICS #38)				

Internal A	Audit	Compliance	Checklist
------------	-------	------------	-----------

Auditor's Name and Date

# BRANCH OFFICE REGULATION 6A WALK-THROUGH PROCEDURES

Licensee:		Review Period:		
Questions	Yes	No	N/A	Comments, W/P Reference
46. When a cash deposit transfer is received from an affiliate, for all full and partial returns of each delivery, are the denominations and the number of bills of each denomination of the cash returned, recorded and communicated to the transferring licensee? (6A MICS #38)				
Job Duties and Responsibilities				
47. Does each branch office employee properly record transactions that fall under the criteria of <b>Regulation 6A</b> on the appropriate forms and logs, and in the manner prescribed by the <b>6A MICS?</b> ( <b>6A MICS #17b</b> )				
48. Does each branch office employee make a diligent effort to identify and report suspicious transactions? (6A MICS #17d)				
49. Does each branch office employee have knowledge of <b>Regulation 6A</b> and the <b>6A MICS</b> relevant to their position? <b>(6A MICS #17e)</b>				
50. Does each branch office employee ensure that prohibited transactions pursuant to <b>Regulation 6A.020</b> do not occur? <b>(6A MICS #17a)</b>				
General				
51. Does the branch office have CTRC-N forms available? (6A MICS #1 and #7)				

Internal A	Audit	Compliance	Checklist
------------	-------	------------	-----------

Auditor's Name and Date

# BRANCH OFFICE REGULATION 6A WALK-THROUGH PROCEDURES

Licensee:		I	Review	Period:
Questions	Yes	No	N/A	Comments, W/P Reference
52. When the branch office performs cash transactions with a patron, do branch office personnel comply with the prohibited, recording and reporting requirements of <b>Regulation 6A</b> and the <b>Regulation 6A Minimum Internal Control Standards</b> ? Indicate any exceptions noted.				
53. If the 6A licensee posts a sign, or gives a pamphlet to patrons, that describes prohibited transactions and reportable transactions, is the information provided to the patron in compliance with <b>Regulation</b> 6A.090?				
54. Are collections deposited into a company account (i.e., are collections not deposited into an independent agent's or office representative's personal account)?  Regulation 6A.050(2)(f)				

Verified per representation Verified per observation/examination

**Procedures Modified or Added** 

EFFECTIVE: July 1, 2004 Page 17 of 17

Internal	Andit	Compliance	Checklist

Auditor's Name and Date	

#### BRANCH OFFICE TESTING PROCEDURES

Review Period:

NGC Regulation 6.090(15) requires the internal auditor to use guidelines, checklists and other "criteria established by the chairman" in determining whether a Group I licensee is in compliance with applicable statutes, regulation, and Minimum Internal Control
Standards (MICS). The use of this checklist satisfies these requirements.
Objectives:
To determine if the controls for branch offices are adequate to ensure credit and collection procedures comply with the Regulations and the MICS/6A MICS.
Scope:
Branch offices (as defined by <b>Regulation 6A.010</b> ), and/or independent agents [as defined by <b>Regulation 25.010(1)</b> ] that either accepted more than \$500,000 (cash or non-cash) in deposits or collected, in total, more than \$500,000 (cash or non-cash) on credit instruments during the previous fiscal year, or more than \$500,000 in the fiscal year to date are visited and reviewed at <b>least every other year</b> .
Branch offices (as defined by <b>Regulation 6A.010</b> ) not meeting the aforementioned criteria are visited and reviewed at <b>least once</b> every five years.
This walk-though checklist is intended for such visits and should not be completed as part of "in-house" walk-through procedures. Review the list of branch offices and independent agents maintained pursuant to Cage and Credit MICS #73 [total payments collected on credit instruments is based on branch office's documentation required in MICS #74(a)] in determining which branch offices are to be visited. A copy of this list should be included in the internal audit workpapers.

#### Preparation:

Review the MICS/6A MICS variations and regulation waivers scheduled during the cage and credit walk-through procedures, the Regulation 6A - Currency Transaction Reporting walk-through procedures and the Branch Office Visits walk-through/Regulation 6A walk-through procedures. Review the written system of internal control, including collection practices when applicable, for any additional controls concerning branch offices. Modify and/or perform additional procedures as applicable. Note below the number of the procedure modified or added. Only the last two columns need to be completed if the remaining information is scheduled elsewhere. Refer to the workpaper where the details are scheduled.

Indicate Branch Office Visited and Date of Visit:

Date Approval	MICS Number or	Description of Variation/Waiver Granted	Number(s) of Procedure Modified or	W/P Ref. (if appl.)
Granted	Regulation		Added	

✓ - Step completed without exception

**VERSION 2** 

EFFECTIVE: July 1, 2004 Page 1 of 5

<b>Internal Audit</b>	Compliance	Checklist

Auditor's Name and Date

### BRANCH OFFICE TESTING PROCEDURES

Licensee:		Review Period:	
	_		

#### **Checklist Completion Notes:**

- 1) Each step contains a parenthetical notation at the end of the step to designate the purpose of the step. Steps to ascertain compliance with a regulation or minimum standards will be followed by the appropriate regulation or standard. Steps to test the clerical accuracy of revenue will be followed by "Revenue". Steps to determine whether assets were protected will be followed by "Asset Protection".
- 2) Document the completion of the procedures listed below. All exceptions noted should be carried to the Audit Report/Summary of Findings for timely follow-up. Indicate the workpaper reference in which the exception has been carried forward to, as applicable, in the "Exception/Comment" column.

Branch Office:	Test Date:		Step completed without exception	Exception/Comment
exceptions or include and follow exceptions	or internal audit reports. So cited, including those cited a copy of the prior audit repup on any problems noted, when the CPA is referring dit reports is not necessary.	by the GCB or the CPA, orts in the workpapers Duplication of		
accounts he credit instr	branch office visit, obtained by the branch office. Ruments contained in the brauld be done by individual a	econcile this listing to the nch office. (MICS #18)		
sample of	rent listing selected in the p 5 patron account balances t listings. (MICS #52)	-		

✓ - Step completed without exception

**VERSION 2** 

EFFECTIVE: July 1, 2004 Page 2 of 5

Auditor's Name and Date

### **Internal Audit Compliance Checklist**

### BRANCH OFFICE TESTING PROCEDURES

Licensee: Re		view Period:	
	ranch Test ffice: Date:	Step completed without exception	Exception/Comment
4.	Inquire as to the whereabouts of deposits that are being held by the branch office (e.g., safe or desk in the branch office, bank safe deposit box), count the funds and have the branch office representative account for said funds. All amounts counted are traced to the amount recorded on the appropriate accountability form to ensure the proper amount is recorded. Documentation is maintained evidencing the count amounts for each area and the subsequent comparison to the appropriate accountability form. (Asset Protection)		
5.	If the funds noted in step #4 represent transactions requiring the logging of transactions on an MTL or the completion of a CTRC-N, determine whether the transactions were logged or a report was filed, as applicable.		
6.	Review the collection effort for all active accounts to ensure that a reasonable effort was documented at a minimum every 90 days. <b>Regulation 6.120(3)</b>		
7.	For any written-off accounts in the branch office inventory, review the collection effort to ensure that a reasonable effort was documented at a minimum every 90 days prior to write-off. <b>Regulation 6.120(3)</b>		
8.	For any settled accounts in the branch office inventory, examine the settlement forms for the following requirements imposed by <b>Regulation 6.120(6)</b> :		
	a. Debt is settled with the patron or his representative [as further explained in <b>Regulation 6.120(6)</b> ].		
	b. The settlement is authorized by persons designated to do so in the licensee's system of internal control and is reflected in a single document including the items listed below:		

✓ - Step completed without exception

**Regulation 6.120(6)(b)** 

EFFECTIVE: July 1, 2004

Control Board	Auditor's Name and Date	

### **Internal Audit Compliance Checklist**

### BRANCH OFFICE TESTING PROCEDURES

Licensee:		Review Period:	
Branch Office:	Test Date:	Step completed without exception	Exception/Comment
1) Patron's	name.		
2) The orig	inal amount of the credit instrument.		
3) The amo	ount of the settlement stated in words.		
4) The date	of the agreement.		
5) The reas	on for the settlement.		
6) The patr	on's signature.		
	er any of the settlement forms examine been in the branch office over 72 h CS #34)		
	rent day's front money balance on the lity to underlying documentation. (A		
	ent month's bank records for the b nance of steps #11-13.	ranch	
on markers to the	rtion of bank deposits which include a total collections amount recorded or records to ensure that all collections and (Revenue)	n the	
excess of \$3,000.	posit slips for evidence of cash deposit positions for evidence of cash deposit positions are perfectly and trace to the MTL or CTRC-	prohibited,	

 $\checkmark$  - Step completed without exception

VERSION 2

EFFECTIVE: July 1, 2004 Page 4 of 5

Auditor's Name and Date	
	1

### **Internal Audit Compliance Checklist**

### BRANCH OFFICE TESTING PROCEDURES

Licensee: Re		Review Period:	eview Period:		
Branch Office:	Test Date:	Step completed without exception	Exception/Comment		
of disbursements other than the lice	statement and canceled checks for in excess of \$3,000 to individuals/ensee. Determine if such transactionals of the or reportable and trace to the Micable.	entities ons are			
envelopes, credit wire transfers, and disclose cash tran transactions are p	ntly completed month, review mark cards, front money records, transm d any other accounting record whice sactions, and determine whether no rohibited, loggable or reportable are C-N, as applicable.	ittal forms, ch would oted cash			
1	the home office, trace the most recorded in the branch office to <b>Revenue</b> )				
Procedures Modified	or Added				

 $\checkmark$  - Step completed without exception

VERSION 2

EFFECTIVE: July 1, 2004 Page 5 of 5